

MEMO ENDORSED

SHOOK
HARDY & BACON

October 31, 2022

Joseph Iemma

Sent by ECF

Hon. Kenneth M. Karas
United States District Court
Southern District of New York
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White Plains, New York 10601

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RE: *Cukar v. Compass Group USA, Inc., et ano.*
Case No.: 7:21-cv-07626
Request for Extension of Time for Pre-Motion Letters

Dear Hon. Karas:

My firm represents the defendants in this matter. Please allow this letter to serve as a request to extend the deadlines for pre-motion letters for dispositive motions. Presently, the deadline for pre-motion letters to be filed is November 7, 2022 with responses due November 14, 2022.

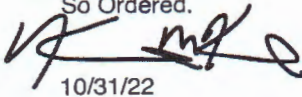
This request is made in response to the Magistrate granting Plaintiff an extension this morning, allowing additional time for plaintiff to pursue two non-party depositions in the next 30 days. Defendants therefore request additional time, 60 days, to allow the non-party witness depositions to be conducted so Defendants may rely upon and refer to a complete Record in presenting any dispositive arguments to the Court.

Therefore, the defendants request that the deadline for pre-motion letters for dispositive motions be extended to January 9, 2023 with responses due January 17, 2023. Plaintiff's counsel stated at this morning's conference that she does not oppose this request.

Granted, but in the future, all requests to extend discovery must be made to this Court. The next case management conference will be 1/25/23, at 11:30

Respectfully Submitted,

So Ordered.


10/31/22

Joseph A. Iemma
Joseph A. Iemma, Esq.

cc: All counsel of record. (by ECF)